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5 Attorneys for Defendant
6 BACKGROUNDCHECKS.COM LLC

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
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11 GEORGE POLANCO JR.,

12 Plaintiff,

13 v.

14 BACKGROUNDCHECKS.COM LLC,

15 Defendant.

Case No. 2:22-cv-00713-GMN-DJA

**STIPULATION TO EXTEND TIME FOR
DEFENDANT
BACKGROUNDCHECKS.COM LLC TO
FILE RESPONSIVE PLEADING TO
PLAINTIFF'S COMPLAINT**

[FIRST REQUEST]

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17 Plaintiff George Polanco Jr. ("Plaintiff") and Defendant Backgroundchecks.com LLC
18 ("Defendant"), by and through their undersigned counsel, hereby agree and stipulate to extend the time
19 for Defendant to file a response to the Complaint from the current deadline of May 31, 2022, up to
20 and including June 30, 2022.

21 The requested extension is necessary in light of the fact that Defendant's counsel was recently
22 retained. The additional time will allow defense counsel to conduct a complete investigation into the
23 allegations and to prepare a response to the Complaint.

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1 This is the first request for an extension of time to respond to the Complaint. This request is
2 made in good faith and not for the purpose of delay.

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4 Dated: May 19, 2022

Dated: May 19, 2022

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6 Respectfully submitted,

Respectfully submitted,

7
8 /s/ Gerardo Avalos

9 MICHAEL KIND, ESQ.
KIND LAW

/s/ Diana G. Dickinson

DIANA G. DICKINSON, ESQ.
LITTLER MENDELSON, P.C.

10 GEORGE HAINES, ESQ.
11 GERARDO AVALOS, ESQ.
FREEDOM LAW FIRM, LLC

Attorney for Defendant
BACKGROUNDCHECKS.COM LLC

12 *Attorneys for Plaintiff*
GEORGE POLANCO JR.

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14 **IT IS SO ORDERED.**

15 Dated: May 20, 2022

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19 DANIEL J. ALBREGTS
20 UNITED STATES MAGISTRATE JUDGE
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